

1 IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT IN AND
2 FOR UTAH COUNTY, STATE OF UTAH
3 -----

4 PROVO CITY CORPORATION,
5 a Municipal Corporation of
6 the State of Utah,

7 Plaintiff,

8 -vs-

9 HUBERT C. LAMBERT, as State
10 Engineer of the State of
11 Utah; Et Al,

12 Defendants.

INTERROGATORIES

Civil No. 34,701

13 In accordance with the provisions of Rule 33, Utah Rules
14 of Civil Procedure, Plaintiff submits herewith the following
15 Interrogatories to be answered by the Defendant, Hubert C. Lambert,
16 as State Engineer of the State of Utah, under oath and within
17 fifteen days of the date of service hereof:

18 1. State all of the facts upon which the Defendant,
19 Hubert C. Lambert, as State Engineer of the State of Utah, bases
20 his denial of the Plaintiff's claim that "the Plaintiff is the
21 owner of and is entitled to the use of water from the Provo River,
22 during the irrigation season, for the purposes of domestic and
23 municipal uses and for the generation of power, of the 16.5
24 second-feet of water referred to and identified in Paragraph 4 at
25 Page 13 of the decree of the District Court of Utah County, Utah,
26 dated May 2, 1921, entitled, 'Provo Reservoir Company, vs. Provo
27 City, et al., Defendants;' being Civil No. 2888; commonly
28 referred to as the 'Provo River Decree'."

29 2. State the names and addresses of all persons known
30 to the Defendant, Hubert C. Lambert, as State Engineer of the
31 State of Utah, who have knowledge of any of the facts recited in
32 the Defendant's answer to the preceeding interrogatory.

1 3. Identify with particularity each and every written
2 document upon which the Defendant, Hubert C. Lambert, as State
3 Engineer of the State of Utah, relies, or will rely, to prove any
4 of the facts recited in his answer to the foregoing interrogatory
5 number one; and state the names and addresses of all persons who
6 have custody of each of such written documents.

7 4. State the names and addresses of all persons whom
8 the Defendant, Hubert C. Lambert, as State Engineer of the State
9 of Utah, intends to call as witnesses in the trial of the above
10 entitled case.

11 DATED this 6th day of April, A. D., 1971.

12
13 /s/ Richard L. Maxfield

14 RICHARD L. MAXFIELD
15 Attorney for Plaintiff
16 28 North 100 East
17 Post Office Box 1097
18 Provo, Utah 84601

19 Mailed a true and correct copy of the foregoing
20 Interrogatories to Dallin W. Jensen, Assistant Attorney General,
21 Attorney for Defendants Hubert C. Lambert and Hugh McKellar, at
22 442 State Capitol, Salt Lake City, Utah 84114, in a postage
23 prepaid envelope, this 6th day of April, 1971.

24 /s/ Richard L. Maxfield

25 RICHARD L. MAXFIELD
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